

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN P. "JACK" FLYNN and :
LESLIE A. FLYNN :
: Plaintiffs, : 1:21-cv-02587 (AS/SLC)
: :
-v- :
: CABLE NEWS NETWORK, INC., :
: : Defendant. :
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**DECLARATION OF JARED J. ROBERTS IN OPPOSITION TO DEFENDANT
CABLE NEWS NETWORK, INC.'S MOTION FOR SUMMARY JUDGMENT**

I, JARED J. ROBERTS, declare as follows:

1. I am an associate at Binnall Law Group, counsel to Plaintiffs John P. "Jack" Flynn and Leslie A. Flynn (respectively, "Jack" and "Leslie").
2. I make this declaration in order to annex exhibits relied upon in opposition to Defendant Cable News Network, Inc.'s ("CNN") Motion for Summary Judgment.
3. Annexed hereto as **Exhibit A** is a true and correct copy of the transcript from the deposition of CNN employee Donie O'Sullivan, taken in this action on February 27, 2023.
4. Annexed hereto as **Exhibit B** is a true and correct copy of a Wall Journal article written by Brett entitled "What Is QAnon? What We Know about the Conspiracy Theory Group," which was marked as Exhibit 5 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

5. Annexed hereto as **Exhibit C** is a true and correct copy of a screenshot of the Paramount Plus website that contains a for-purchase version of the CBS 60 Minutes report entitled "QAnon's corrosive impact on the U.S." which was marked as Exhibit 6 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

6. Annexed hereto as **Exhibit D** is a true and correct copy of a transcript of the February 26, 2021 CNN Special Report, entitled "The Cult of QAnon." which was marked as Exhibit 9 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

7. Annexed hereto as **Exhibit E** is a true and correct copy of a still shot from the CNN Report at issue in this litigation, entitled "Exclusive: CNN goes inside a gathering of QAnon followers," which was marked as Exhibit 11 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

8. Annexed hereto as **Exhibit F** is a true and correct copy of a still shot from MSNBC's Rachel Maddow Show which was marked as Exhibit 12 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

9. Annexed hereto as **Exhibit G** is a true and correct copy of a transcript of a February 5, 2021, airing of the CNN Report at issue in this litigation, entitled "Exclusive: CNN goes inside a gathering of QAnon followers," which was marked as Exhibit 13 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

10. Annexed hereto as **Exhibit H** is a true and correct copy of a transcript of a February 6, 2021, airing of the CNN Report at issue in this litigation, entitled "Exclusive: CNN goes inside a gathering of QAnon followers," which was marked as Exhibit 14 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

11. Annexed hereto as **Exhibit I** is a true and correct copy of House Resolution 1094, entitled "Condemning QAnon and Rejecting the Conspiracy Theories it Promotes," dated August 25, 2020, which was marked as Exhibit 24 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

12. Annexed hereto as **Exhibit J** is a true and correct copy of a series of tweets by Jack Flynn dated August 13, 2020, which was marked as Exhibit 32 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

13. Annexed hereto as **Exhibit K** is a true and correct copy of a series of tweets by Jack Flynn dated August 20, 2020, which was marked as Exhibit 33 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

14. Annexed hereto as **Exhibit L** is a true and correct copy of a tweet by Jack Flynn dated August 21, 2020, which was marked as Exhibit 34 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

15. Annexed hereto as **Exhibit M** is a true and correct copy of a tweet by Jack Flynn dated August 21, 2020, produced by CNN in this action with the Bates stamp CNN001070-CNN001086, which was marked as Exhibit 50 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

16. Annexed hereto as **Exhibit N** is a true and correct copy of an email from Donie O'Sullivan to Philippa Holland, dated February 2, 2021, produced by CNN in this action with the Bates stamp CNN000690, which was marked as Exhibit 51 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

17. Annexed hereto as **Exhibit O** is a true and correct copy of an email chain between Donie O'Sullivan, Richard Davis, and Philippa Holland, dated February 2, 2021, produced by CNN in this action with the Bates stamp CNN001439, which was marked as Exhibit 52 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

18. Annexed hereto as **Exhibit P** is a true and correct copy of an email chain It's an email chain between Donie O'Sullivan, Steve Keel, Emma Lacey-Bordeaux, Fuzz Hogan that it an email chain between Donie O'Sullivan and In The Matrix, dated February 4, 2021, produced by CNN in this action with the Bates stamp CNN001507, which was marked as Exhibit 59 to the deposition of Donie O'Sullivan, taken in this action on February 27, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 20, 2023

/s/ Jared J. Roberts
Jared J. Roberts